

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,  
Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM  
SERVICES LLC., and AMAZON WEB  
SERVICES, INC.,  
Defendant.

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Case No. 7:24-cv-00030-ADA-DTG

**JURY TRIAL DEMANDED**

**PLAINTIFF VIRTAMOVE, CORP.'S UNOPPOSED  
MOTION TO EXTEND THE STAY OF TRANSFER**

VirtaMove hereby moves the Court to extend the stay of this case to allow time for appeal. VirtaMove's counsel conferred with Jeremy Anapol, counsel for remaining defendant Amazon Web Services, Inc. ("Amazon"), who indicated that Amazon is unopposed to this motion.

The Court issued a Transfer Order ordering transfer to the NDCA but staying the actual transfer of this case until February 22, 2025 "to allow Plaintiff time to appeal this decision if it chooses." Dkt. 87 at 6.

VirtaMove has filed its Objections to the Transfer Order. Dkt. 89. VirtaMove hereby gives notice that it intends to appeal the Transfer Order by petitioning for a writ of mandamus if VirtaMove's objections are overruled. Amazon is expected to file its opposition to VirtaMove's Objections. To allow sufficient time for briefing, to give the Court time to rule on the objections, and to allow time for the appeal process, VirtaMove moves the Court to extend the stay of this case and to extend the date of transfer until the appeal is resolved. The stay would continue to encompass all unreach deadlines, except for deadlines related to managing the stay of this case and except for filings related to objections to the Transfer Order.

Dated: February 7, 2025

Respectfully submitted,

By: /s/ Qi (Peter) Tong

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*Attorneys for Plaintiff VirtaMove, Corp.*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that on February 7, 2025, I electronically filed the foregoing document using the CM/ECF system which will send notifications to all parties of record.

February 7, 2025

/s/ Qi (Peter) Tong  
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**CERTIFICATE OF CONFERENCE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-7(G), I hereby certify that I conferred with opposing counsel, and the relief sought herein is unopposed.

February 7, 2025

/s/ Qi (Peter) Tong  
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